



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

4WD-RCRA

MAR 02 2007

R. Bruce Scott, P.E., Director,
Division of Waste Management
Kentucky Department for Environmental Protection (KYDEP)
14 Reilly Road
Frankfort, Kentucky 40603

SUBJ: RCRA Compliance Evaluation Inspection
Cincinnati/Northern Kentucky International Airport
EPA ID Number: KYD 980 557 516

Dear Mr. Scott:

On December 8, 2006, U.S. Environmental Protection Agency (EPA) and Kentucky Department for Environmental Protection (KYDEP) representatives conducted a Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) at the Cincinnati/Northern Kentucky International Airport in Boone County, Kentucky. This was an EPA/State joint inspection for evaluating the facility's compliance with the applicable RCRA regulations.

Enclosed is the EPA RCRA Site Inspection Report. If you have any questions regarding this matter, please contact John C. Goodwin, of my staff, by phone at (404) 562-8488 or by e-mail at goodwin.john@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug C. McCurry".

Doug C. McCurry, Section Chief
North Enforcement and Compliance Section
RCRA/OPA Enforcement & Compliance Branch

Enclosure

cc: Bing Dickerson, KYDEP, Florence



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CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Donald R. Chapman, Environmental/Safety Manager
Cincinnati/Northern Kentucky International Airport
P.O. Box 752000
Cincinnati, OH 45275-2000

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Sincerely,

A handwritten signature in black ink, which appears to read "Doug McCurry", is written over a large, stylized, light-colored circular mark.

Doug McCurry, Section Chief
North Enforcement & Compliance Section
RCRA/OPA Enforcement & Compliance Branch

Enclosure

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

1) **Author of Report**

John C. Goodwin, Environmental Engineer

2) **Facility Information**

Cincinnati/Northern Kentucky International Airport
P.O. Box 752000
Cincinnati, OH 45275-2000
Phone: (859) 767-3151
EPA ID Number: Non-notifier

3) **Responsible Official**

Donald R. Chapman, Environmental/Safety Coordinator
Cincinnati/Northern Kentucky International Airport

4) **Inspection Participants**

Donald R. Chapman, Cincinnati/Northern Kentucky International Airport
Melissa Wilber, KYDEP
Bing Dickerson, KYDEP
John C. Goodwin, EPA-Region 4/RECB

5) **Date of Inspection**

December 8, 2006

6) **Applicable Regulations**

RCRA Sections 3005 and 3007
40 Code of Federal Regulations (CFR) Parts 260 - 266, 268, 270 and 273
Title 401 Kentucky Administrative Regulations (KAR) Chapters 32-49

7) **Purpose of Inspection**

The purpose of the inspection at the Cincinnati/Northern Kentucky International Airport was to conduct an unannounced EPA/State joint Compliance Evaluation Inspection (CEI)

and determine compliance under the Resource Conservation and Recovery Act (RCRA) regulations and statutes.

8) **Facility Description**

The Cincinnati/Northern Kentucky International Airport is located in Boone County, Kentucky. The airport (airport identifier-CVG) is owned and operated by the Kenton County Airport Board (KCAB). CVG has four fully instrumented runways, three terminal buildings, and three concourse buildings that partially comprise the airport grounds of approximately 7,000 acres. CVG operates 24 hours, 7 days a week. Airlines are responsible for any of the prohibited items collected from checked baggage. TSA is responsible for any hazardous waste at passenger screening checkpoints. CVG generates the majority of its hazardous waste from painting operations. CVG also exercises solid waste collection on the airport grounds. The facility is registered with the Commonwealth of Kentucky as a small quantity generator (SQG) of hazardous waste but is operating as a conditionally exempt small quantity generator (CESQG) at the time of inspection.

9) **Findings**

On December 8, 2006, John C. Goodwin of EPA, along with Bing Dickerson and Melissa Wilber of KYDEP arrived at the facility at approximately 10:30 a.m. Donald Chapman, Environmental/Safety Manager, received the inspectors. The inspectors introduced themselves, showed their credentials, and explained the purpose of the visit. **Bold print is provided for items of primary importance, rule citations, and specific observations.** The following areas were inspected:

Field Maintenance Buildings

The first maintenance building inspected was the most active of the maintenance areas. There are no hazardous waste generated in this area of the airport. Maintenance has a parts washer that is serviced by Crystal Clean under the Continued Use Program. The facility has various sized oil storage containers inside the building. Containers of used oil were properly marked with the words, "Used Oil." Spent batteries are stored inside the building and are picked up by Battery Man.

Between the first and second maintenance buildings inspected, the airport has three fuel storage tanks. The two white tanks were double-walled tanks. CVG has placed sandbags around the brown tank and smaller white tank. The brown tank does not have adequate secondary containment. The tanks were not bolted securely to the ground.

The second maintenance building inspected is used for equipment storage more than maintenance operations. CVG stores runway paint machines in this area. Also, approximately twelve drums of oil products were stored in this building.

A 2000-gallon diesel tank was observed near the sand storage buildings. The tank did not have secondary containment and was not bolted to the ground. The drains in the parking lot lead to the storm water drainage system. CVG maintains a storm water treatment system that discharges under permit to a nearby creek.

Fire Training Area

The Fire Training Area is a fenced in training area for local firefighters. The area has one 10,000-gallon tank of fuel for fire training. The tank has a secondary containment pit. Fuel is conveyed by underground pipes to a HDPE lined pit where the fuel is ignited for fire training exercises. The resulting mixture from exercises is drained to a collection pit. Used fuel is recovered by an oil/water separator.

Waste Water Treatment Lab

The waste water treatment lab tests the Biological Oxygen Demand (BOD) and Chemical Oxygen Demand (COD) of effluent. The lab tests generate D002 and D009 waste corrosive liquids that CVG stores in two five-gallon buckets. Both containers were properly closed and marked.

Terminal 1

The facility places its universal waste lamps in a locked storage room. CVG had approximately 14 containers of waste lamps that were improperly marked as "bulbs" and not closed. There were approximately 23 light bulbs not placed in a container. **EPA recommends that the waste lamps are placed in closed containers that are labeled or marked clearly with the words "Universal Waste-Lamps," "Waste Lamps," or "Used Lamps."** The broken waste lamps are placed in a 30-gallon drum. **EPA recommends that CVG label the container of broken waste lamps clearly with the words, "Hazardous Waste."**

Building Maintenance

CVG has a paint booth in Building Maintenance. In the paint gun cleaning area, a hazardous waste drum for paint waste was observed properly marked but was not closed. **EPA recommends that CVG keep hazardous waste containers closed except during filling and emptying of the containers to correctly quantify waste generator status**


and prevent the potential for a flammable atmosphere. No wastes were present at the time of inspection inside the paint booth or the paint storage room. The majority of the paints in the paint storage room were latex based. Building Maintenance has a saw dust collector for sanding and milling that is connected to a drum outside of the building through a hopper.

Record Keeping

CVG submitted manifests for hazardous waste and waste lamps for inspection. The facility does not have an SPCC plan implemented.

CVG is in violation of 40 C.F.R. § 112. CVG is regulated as an onshore storage facility and must develop and implement an SPCC Plan at the airport immediately.


10) Signed



John C. Goodwin
Environmental Engineer

2-28-07
Date

11) Concurrence



Doug C. McCurry, Section Chief
North Enforcement & Compliance Section
RCRA/OPA Enforcement & Compliance Branch

2/28/07
Date